

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Amy Kempczynski

Chapter: 13,
BANKRUPTCY NO: 18-16269-ELF

*Order Denying Motion of State Financial Network
For Modification of Stay*

AND NOW, this day of 2,020 upon consideration of the
Debtor's Answer and a Hearing,

IT IS HEREBY ORDERED

That The Motion of State Financial Network for Modification of Automatic
Stay Is Denied.

SO ORDERED

BY THE COURT

U.S. BANKRUPTCY JUDGE

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Amy Kempczynski

Chapter: 13,

BANKRUPTCY NO: 18-16269-ELF

**Debtor's Answer to the Motion of
State Financial Network for Relief from Automatic Stay**

Debtor, by his attorney, Allan K. Marshall, Esq., answers the Motion of State Financial Network:

1. Admitted.
2. Admitted.
3. This para sates a conclusion of law to which no response is required. Debtor demands strict proof of all the factual averments of this para.
4. Admitted.
5. Admitted.
6. This para sates a conclusion of law to which no response is required.
7. This para sates a conclusion of law to which no response is required. If true and if proven, Debtor willing to cure the missing amount.
8. This para sates a conclusion of law to which no response is required.
9. This para sates a conclusion of law to which no response is required. If true and if proven, Debtor willing to cure the missing amount.
10. This para sates a conclusion of law to which no response is required. If true

and if proven, Debtor willing to cure the missing amount.

11. This para sates a conclusion of law to which no response is required. If true and if proven, Debtor willing to cure the missing amount.
12. WHEREFORE, Debtor demands a hearing.

FIRST DEFENSE
SUFFICIENT EQUITY

13. Debtor has equity, protect the interest of State Financial Network.

SECOND DEFENSE
Less Drastic Remedy

14. Even if the moving party is entitled to the Relief from the Stay, the Stay should not be terminated. The Court should rather grant less drastic Relief by conditioning or modifying the Stay.
15. WHEREFORE, the Debtor requests this Honorable Court to deny the Motion for Modification of the Stay and for such other Relief as the Court deems just and proper.

Respectfully Submitted,

/s/
Allan K. Marshall, Esq.
Attorney for Debtor

September 23, 2020